

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

In Re BAYCOL PRODUCTS LITIGATION,

MDL No. 1431

This Document Relates to:

United States *ex rel.* Simpson,

Plaintiff,

**DECLARATION OF LAURIE  
SIMPSON**

Case No. 08-5758 (MJD/SRN)

v.

Bayer Healthcare *et al.*,

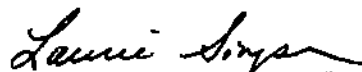
Defendants.

LAURIE SIMPSON hereby declares pursuant to 28 U.S.C. § 1746:

1. I am the relator in this *qui tam* action. I submit this declaration in opposition to defendants' motion to dismiss. I am fully familiar with the facts and circumstances set forth herein.

2. I first approached the Federal Government in early 2005, disclosing information upon which this action is based. Subsequently, I commenced this action in October 2006. Additionally, the information I disclosed to the Federal Government included information relating to the Pacificare studies and to the Department of Defense Contract.

Dated: May 5, 2011



LAURIE SIMPSON